

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 10/30/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
)
Rahul Manchanda,)
Plaintiff,)
)
-v-)
)
Attorney Grievance Committee Chief)
Abigail Reardon, Staff Attorney)
Remi Shea, Chief Counsel Jorge)
Dopico, Judge Rolando Acosta,)
Defendants.)
)
-----X

INDEX NO. 23-CV-9292

NOTICE OF MOTION FOR
CONTEMPT AGAINST DEFENDANT
ROLANDO ACOSTA

PLEASE TAKE NOTICE that upon the annexed affirmation of Rahul Manchanda duly affirmed the 30th day of October 2023, the annexed Memorandum of Law and Exhibits, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court at US SDNY, 500 Pearl Street, New York NY 10007, on October 31, 2023 at 10 AM, or as soon thereafter as Counsel can be heard for an order holding Rolando Acosta in Civil and Criminal Contempt of Court for wilful violations of this Honorable Court's order.



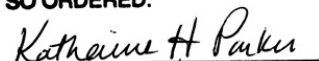
Dated: October 30, 2023
New York, NY

Rahul Manchanda, Esq.
Manchanda Law Office PLLC
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (212) 968-8600
Fax: (212) 968-8601

The Court is in receipt of Plaintiff's motion. This motion will be discussed at the upcoming Initial Case Management Conference scheduled on January 9, 2024 at 11:45 a.m. Plaintiff will have the opportunity to be fully heard at that conference.

York NY 10010

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

10/30/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X)	
)	
Rahul Manchanda,)	
Plaintiff,)	
)	INDEX NO. 23-CV-9292
-v-)	
)	
Attorney Grievance Committee Chief)	
Abigail Reardon, Staff Attorney)	
Remi Shea, Chief Counsel Jorge)	
Dopico, Judge Rolando Acosta,)	AFFIRMATION IN SUPPORT OF
)	MOTION FOR CONTEMPT
)	
)	
-----X		

STATE OF NEW YORK }
 : ss
COUNTY OF NEW YORK }

RAHUL MANCHANDA, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Defendant Rolando Acosta in all respects based upon my personal knowledge of the facts and experiences I relate herein and based upon information and belief, based on the contents of the file.
2. On the grounds that Rolando Acosta keeps using his law clerk Kam Yuen to block service of this court's federal court order by rejecting, tampering, sabotaging and preventing service thereon;
3. Further using his law clerk Kam Yuen to prevent Plaintiff from serving his formal Answer on a Petition as well as other pleadings.
4. And for such other further relief as this Honorable Court deems just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendant Rolando Acosta for willful violations of U.S. Federal Law, a federal judicial order, and other willful violations of this Honorable Court.

WHEREFORE, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendant Rolando Acosta.



Dated: October 30, 2023
New York, NY

Rahul Manchanda

Subject: Re: NYSCEF Alert: Appellate Division - 1st Dept - Attorney Matters - <DOCUMENT RETURNED> 1336.2021 (ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA)
From: Manchanda Law Office PLLC <info@manchanda-law.com>
Date: 10/30/2023, 11:39 AM
To: efile@nycourts.gov, kyuen@nycourts.gov, Kelly McCollum <kelly@law-mccollum.com>, "Remi E. Shea" <reshea@nycourts.gov>, "Joel A. Peterson" <japeters@nycourts.gov>, AD1-AGC-newcomplaints@nycourts.gov, AD1-AGC@nycourts.gov, cmnelson@nycourts.gov, ig@nycourts.gov, FBI IC <ny1@ic.fbi.gov>, newyork@fbi.gov

NYS Office of the Inspector General
25 Beaver Street
New York, NY 10004

As per the below, this is a formal complaint and request for investigation against NYS Supreme Court Appellate Division First Department Chief Law Clerk Kam Yuen located at 27 Madison Avenue, New York NY 10010 who, in contempt of a SDNY federal court order, is blocking, tampering, inhibiting, sabotaging, preventing, and otherwise obstructing federal court ordered service of process on his boss and defendant Presiding Judge Rolando Acosta.

Please urgently investigate, rectify, and advise.

Thanks,

cc: NYC FBI Field Office

Kind regards,

--

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment at <https://manchanda-law.com/contact-us/>

On Oct 30, 2023, at 11:05 AM, Manchanda Law Office PLLC <info@manchanda-law.com> wrote:

Hello Kam Yuen:

Yes this was SDNY court ordered service on your boss and defendant Presiding Judge Rolando Acosta which was also sent via US Mail, Email, and ECF.

You are pre-empted by federal law from rejecting it.

Thanks,

Kind regards,

--

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor

Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment at <https://manchanda-law.com/contact-us/>

On Oct 30, 2023, at 10:56 AM, efile@nycourts.gov wrote:



Appellate Division - 1st Dept (Digital Copy) DOCUMENT RETURNED FOR CORRECTION 10/30/2023

The court has returned the documents listed below for the following reasons: Document #11 returned. This is a U.S. District Court, SDNY filing, to be filed with Court of SDNY. This digital submission portal is only for Appellate Division related filings only.

Follow the steps below to correct your filing:

1. Make the corrections to your document as instructed in this email, then save it as a PDF.
2. Log into NYSCEF with the same ID that was used to file the original document.
3. Search for the case or select My Cases, then select the case to bring up the Document List.
4. On the Document List, find the "Refile Document" link under the document you need to correct, and attach the corrected document.

Case Information

Appeal #: **1336.2021**

Caption: **ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA**

eFiling Status: **Digital Submission**

Documents Returned on 10/30/2023 10:56 AM

Doc #	Document	Filed Date
11	LETTER EXTENSION - DIGITAL COPY CERTIFICATE OF SERVICE OF ORDER OF REFERENCE TO SDNY MAGISTRATE JUDGE KATHARINE PARKER, INITIAL CASE MANAGEMENT CONFERENCE ORDER OF US MAGISTRATE JUDGE KATHARINE PARKER, ADDITIONAL COPY OF COMPLAINT	

E-mail Notifications Sent

Name

Email Address

RAHUL MANCHANDA INFO@MANCHANDA-LAW.COM

Filing User

RAHUL MANCHANDA | INFO@MANCHANDA-LAW.COM

NOTICE: This e-mail is intended only for the named recipient and for the purposes of the New York State Courts E-Filing System. If you are neither the intended recipient nor a person designated to receive messages on behalf of the intended recipient, notify the sender immediately.

If you are unsure of the contents or origin of this email, it is advised to NOT click on any links provided. Instead, log into your NYSCEF account to access the documents referred to in this email. Thank you.

Subject: NYSCEF Alert: Appellate Division - 1st Dept - Attorney Matters - <DOCUMENT RETURNED> 1336.2021 (ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA)
From: Manchanda Law Office PLLC <info@manchanda-law.com>
Date: 10/30/2023, 11:45 AM
To: efile@nycourts.gov
CC: kyuen@nycourts.gov, "Remi E. Shea" <reshea@nycourts.gov>, Departmental Disciplinary Committee First Department <cmnelson@nycourts.gov>, AD1-AGC-newcomplaints@nycourts.gov, AD1-AGC@nycourts.gov, "Kelly McCollum, Esq." <kelly@law-mccollum.com>



preemption
law.cornell.edu

Kind regards,

--

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment at <https://manchanda-law.com/contact-us/>

On Oct 30, 2023, at 11:02 AM, Manchanda Law Office PLLC <info@manchanda-law.com> wrote:

Hello Kam Yuen:

Yes this was SDNY court ordered service on your boss and defendant Presiding Judge Rolando Acosta which was also sent via US Mail, Email, and ECF.

You are pre-empted by federal law from rejecting it.

Thanks,

Kind regards,

--

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207

New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment at <https://manchanda-law.com/contact-us/>

On Oct 30, 2023, at 10:55 AM, efile@nycourts.gov wrote:



Appellate Division - 1st Dept (Digital Copy) DOCUMENT RETURNED FOR CORRECTION 10/30/2023

The court has returned the documents listed below for the following reasons: Document #10 returned. This is a U.S. District Court, SDNY filing, to be filed with Court of SDNY. This digital submission portal is only for Appellate Division related filings only.

Follow the steps below to correct your filing:

1. Make the corrections to your document as instructed in this email, then save it as a PDF.
2. Log into NYSCEF with the same ID that was used to file the original document.
3. Search for the case or select My Cases, then select the case to bring up the Document List.
4. On the Document List, find the "Refile Document" link under the document you need to correct, and attach the corrected document.

Case Information

Appeal #: **1336.2021**

Caption: **ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA**

eFiling Status: **Digital Submission**

Documents Returned on 10/30/2023 10:55 AM

Doc #	Document	Filed Date
10	NOTICE OF PETITION - DIGITAL COPY ECF/US MAIL SERVICE OF SDNY JUDICIAL ORDER/INITIAL CASE MANAGEMENT CONFERENCE ORDER/REFERRAL TO SDNY JUDGE FOR SCHEDULE/SUMMONS COMPLAINT EXHIBITS CERTIFICATE OF SERVICE CIVIL COVER SHEET/LETTER TO SDNY REGARDING ABIGAIL REARDON/REMI SHEA CRIMES UNETHICAL	

E-mail Notifications Sent

Name

Email Address

RAHUL MANCHANDA INFO@MANCHANDA-LAW.COM

Filing User

RAHUL MANCHANDA | INFO@MANCHANDA-LAW.COM

NOTICE: This e-mail is intended only for the named recipient and for the purposes of the New York State Courts E-Filing System. If you are neither the intended recipient nor a person designated to receive messages on behalf of the intended recipient, notify the sender immediately.

If you are unsure of the contents or origin of this email, it is advised to NOT click on any links provided. Instead, log into your NYSCEF account to access the documents referred to in this email. Thank you.

Subject: Re: NYSCEF Alert: Appellate Division - 1st Dept - Attorney Matters - <DOCUMENT RETURNED> 1336.2021 (ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA)
From: Manchanda Law Office PLLC <info@manchanda-law.com>
Date: 10/30/2023, 11:44 AM
To: efile@nycourts.gov
CC: ig@nycourts.gov, kyuen@nycourts.gov, "Remi E. Shea" <reshea@nycourts.gov>, cmnelson@nycourts.gov, AD1-AGC-newcomplaints@nycourts.gov, AD1-AGC@nycourts.gov, FBI IC <ny1@ic.fbi.gov>, newyork@fbi.gov, migbm@nycourts.gov

NYS Office of the Inspector General
25 Beaver Street
New York, NY 10004

As per the below, this is a formal complaint and request for investigation against NYS Supreme Court Appellate Division First Department Chief Law Clerk Kam Yuen located at 27 Madison Avenue, New York NY 10010 who, in contempt of a SDNY federal court order, is blocking, tampering, inhibiting, sabotaging, preventing, and otherwise obstructing our ability to file a formal ANSWER when we only previously filed a REPLY AFFIRMATION.

Please urgently investigate, rectify, and advise.

Thanks,

cc: NYC FBI Field Office

Kind regards,

--
Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment at <https://manchanda-law.com/contact-us/>

On Oct 30, 2023, at 11:11 AM, efile@nycourts.gov wrote:



**Appellate Division - 1st Dept
(Digital Copy)
DOCUMENT RETURNED FOR
CORRECTION
10/30/2023**

The court has returned the documents listed below for the following reasons: Document #12

returned. The petition of charges before this court, dated October 12th, 2023, was already opposed, and a reply filed. As a result, the petition is considered fully briefed, and no further filing is permitted. This filing is not accepted for filing.

Follow the steps below to correct your filing:

1. Make the corrections to your document as instructed in this email, then save it as a PDF.
2. Log into NYSCEF with the same ID that was used to file the original document.
3. Search for the case or select My Cases, then select the case to bring up the Document List.
4. On the Document List, find the "Refile Document" link under the document you need to correct, and attach the corrected document.

Case Information

Appeal #: **1336.2021**

Caption: **ATTORNEY GRIEVANCE COMMITTEE FIRST DEPARTMENT v. RAHUL D MANCHANDA**

eFiling Status: **Digital Submission**

Documents Returned on 10/30/2023 11:11 AM

Doc #	Document	Filed Date
12	ANSWER - DIGITAL COPY ANSWER TO PETITION FOR CHARGES	

E-mail Notifications Sent

Name	Email Address
RAHUL MANCHANDA	INFO@MANCHANDA-LAW.COM

Filing User

RAHUL MANCHANDA | INFO@MANCHANDA-LAW.COM

NOTICE: This e-mail is intended only for the named recipient and for the purposes of the New York State Courts E-Filing System. If you are neither the intended recipient nor a person designated to receive messages on behalf of the intended recipient, notify the sender immediately.

If you are unsure of the contents or origin of this email, it is advised to NOT click on any links provided. Instead, log into your NYSCEF account to access the documents referred to in this

email. Thank you.